## UNITED STATES BANKRUPTCY COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE:

CHAPTER 7

Laura Waldman, : BANKR. NO. 12-15822 (JKF)

: :

## ACTING UNITED STATES TRUSTEE'S MOTION TO REOPEN CASE

The Acting United States trustee for Region 3, in furtherance of the administrative responsibilities imposed pursuant to 28 U.S.C. Sec. 586(a), by and through the undersigned counsel, hereby moves pursuant to 11 U.S.C. Section 350(b) and Fed.R.Bankr.P. 5010 to reopen this case for the purpose of appointing a trustee to administer newly discovered assets for the benefit of creditors. In support of his motion, the Acting U. S. trustee represents as follows:

- 1. The Debtor commenced this case on June 15, 2012, by filing a voluntary petition under Chapter 7 of the United States Bankruptcy Code.
- 2. On or about June 18, 2012, the U. S. trustee appointed Christine C. Shubert as the chapter 7 trustee (the "Trustee").
- 3. On or about August 18, 2012, the Trustee filed a Report of No Distribution evidencing his/her determination there were no assets to administer.
- 4. The Debtor subsequently received her discharge and the case was closed on October 4, 2012.
- 5. The U. S. trustee was recently contacted regarding the entry of a large judgement in favor of the Debtor from an action which accrued pre-petition.
- 6. The U. S. trustee requests that this case be reopened to appoint a trustee to investigate whether the above referenced action is a viable asset of the bankruptcy estate and

Case 12-15822-ref Doc 51 Filed 09/15/16 Entered 09/15/16 10:10:41 Desc Main Document Page 2 of 2

whether it should be administered for the benefit of the Debtor's creditors.

For the reasons set forth above, among others, the U. S. trustee respectfully requests that the Court conduct a hearing on the above issues and enter an order reopening this case. The U. S. trustee specifically reserves the right to supplement his motion at or prior to the hearing thereon.

DATED this 15th day of September, 2016.

ANDREW R. VARA Acting United States trustee

By: /s/ George M. Conway
George M. Conway
833 Chestnut Street, Suite 500
Philadelphia, Pennsylvania 19107
(215) 597-4411
(215) 597-5795 (fax)